

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PHILIP GODLEWSKI,	:	
	Plaintiff,	
	:	
v.	:	3:24-CV-344-JKM
	:	Judge Julia K. Munley
EDUARDO NICOLAS ALVEAR	:	
GONZALEZ, a/k/a ALVEAR GONZALEZ	:	
EDUARDO NICOLAS, a/k/a	:	
NICOLAS ALVEAR, and	:	
GOOD LION TV, LLC,	:	
	Defendant.	JURY TRIAL DEMANDED

PLAINTIFF'S REPLY BRIEF TO
DEFENDANTS' BRIEF IN OPPOSITION TO
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

ARGUMENT

Defendants, in their Brief in Opposition (Doc. 20-1) make several arguments concerning Defendants' perceptions of the nature and quality of the facts alleged in the Complaint and which Defendants anticipate would be offered at the time of an evidentiary hearing on the request for preliminary relief. Many of these arguments mirror those made in Defendants' motion to dismiss. Defendants also raise, by way of incorporation of their brief in support of their motion to dismiss, their argument that this Court lacks jurisdiction over Defendants.

Plaintiff's response to the motion to dismiss, or alternatively, amended pleading is due on April 25, 2024. Plaintiff intends to submit an amended pleading which will detail additional conduct on the part of Defendants which has been perpetrated since filing the original complaint. Plaintiff will thereafter file a request to amend Plaintiff's motion for preliminary relief to frame the issue since light of this additional information.

Respectfully submitted,

KOLMAN LAW, P.C.

/s/ Timothy M. Kolman

Timothy M. Kolman, PA51982



Timothy A. Bowers, PA77980

414 Hulmeville Avenue

Penndel, PA 19047

(215) 750-3134

Attorneys for Plaintiff.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 23rd day of April 2024 served a true and correct copy of the foregoing document via the Middle District of Pennsylvania CM/ECF system upon the following:

Ryan P. Campbell, Esquire
Dave W. Rothenberg, Esquire
Counsel for Defendants.



Timothy A. Bowers, PA77980

This document has also been filed electronically and is available for viewing and downloading from the ECF system.